REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: November 3, 1998

ANALYST: Richard Ng

I. COMMITTEE:

International Brotherhood of Electrical Workers Local 98 Committee on Political

Education (C00162818)

Mr. James F. Mackin, Treasurer* 1719 Spring Garden Street Philadelphia, PA 19130

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(i)

11 CFR §104.5(c)(1)(i)(A)

III. BACKGROUND:

Failure to Timely File the 1998 April Quarterly Report

The International Brotherhood of Electrical Workers Local 98 Committee on Political Education ("the Committee") failed to timely file the 1998 April Quarterly Report of Receipts and Disbursements covering the period from January 1, 1998 to March 31, 1998. On December 29, 1997 and March 20, 1998, Prior Notices were sent to the Committee informing it that the 1998 April Quarterly Report was due on April 15, 1998 (Attachment 2). A Non-Filer Notice was sent to the Committee via mailgram on May 7, 1998 (Attachment 3).

The Reports Analysis Division ("RAD") analyst attempted to contact Mr. Mackin, treasurer of the Committee, on June 1, 1998. The analyst spoke with Mr. Francis Walsh in his office who said the Committee had sent the original report on

Mr. Mackin is the treasurer of record, however Mr. John J. Dougherty has signed all reports since 1995.

April 9, 1998 and had sent a follow-up copy of the report on May 11, 1998. The analyst informed Mr. Walsh that Commission records did not reflect the receipt of either report. The analyst confirmed the Committee ID number and the FEC mailing address and encouraged the Committee to file another copy to the Analyst's attention as soon as possible to avoid further enforcement action (Attachment 4).

The Committee hand-delivered a copy of the 1998 April Quarterly Report on June 8, 1998 (Attachment 5).

The RAD analyst called Mr. Francis Walsh on September 10, 1998 regarding his statement that the Committee made two attempts to deliver the 1998 April Quarterly Report. The first attempt was on April 9, 1998 and the second on May 11, 1998. The RAD analyst asked Mr. Walsh if the Committee had mail receipts for those filings. He said that he would fax copies of the receipts for the 1998 April Quarterly Report (Attachment 6). The FEC received the FAX later that day (Attachment 7).

The RAD Analyst called Mr. Walsh's office on September 14, 1998, and left a message to have him return the Analyst's call. Mr. Walsh returned the call later in the day. The Analyst informed him that the mail receipts received by the FEC for the 1998 April Quarterly filing seem to indicate the Committee's attempt to file the report, but fail to indicate that the reports were received by the FEC. The RAD analyst asked Mr. Walsh if the Committee had return receipts indicating that the reports were delivered to the FEC. He said he would contact UPS regarding these receipts and fax copies of them to the FEC (Attachment 8). On September 16, 1998, Mr. Walsh called the RAD analyst to inform him that UPS does have receipts showing that the reports were signed for by the FEC and that he will fax copies of these receipts to the FEC (Attachment 9). The FEC received the faxed copies of the UPS mail receipts on September 16, 1998 which indicated that both packages were in fact received by the FEC (Attachment 10).

RAD conducted a search for the documents on microfilm and discovered that the Committee's state campaign expense report had been sent to the Commission instead of the federal Report of Receipts and Disbursements (Attachment 11).

On September 18, 1998 the RAD analyst called Mr. Walsh to explain that the reports the Committee submitted on April 9, 1998 and May 11, 1998 were apparently State filings (Attachment 12). The RAD analyst informed Mr. Walsh that this matter would be referred to the Office of General Counsel because of the

Committee's failure to timely file the 1998 April Quarterly Report. Additionally, the RAD analyst told him that the receipt of the facsimiles would be processed once received and that all correspondence would be taken into consideration. Mr. Walsh informed the analyst that the problems in the Committee's Audit Department during April and May led to the confusion of the incorrect filings.

Attachment 1

DATE 10/28/1998

PAGE 1

COMMITTEE DOCUMENT RECEIPTS DISBURSEMENTS # OF IMAGE
COVERAGE DATES PAGES LOCATION
TYPE OF FILER

INTERNATIONAL BROTHERHOOD O	F ELECTRICAL WORKERS LOCAL 98 COR	MMITTEE ON POLITICAL	EDUCATION ID #CDÖ162818 NON	PARTY QUALIFIED
CONNECTED ORGANIZATION: ELECTR				,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
1997 APRIL QUARTERLY	- AMENDMENT -		1JAN97 -31MAR97	4 98FEC/354/4142
HID-YEAR REPORT	139,015	71,526	79MULOE- 79MALP	14 97FEC/222/3118
1'ST LETTER INFORMA	TIONAL NOTICE		1JAN97 -30JUN97	3 97FEC/256/4499
YEAR-END	~	65,20 6	1JUL97 -31DEC97	14 98FEC/271/1622
YEAR-END	- AMENDMENT -	65,206	1JUL97 -31DEC97	4 98FEC/307/2006
REQUEST FOR ADDITIO	NAL INFORMATION		1JUL97 -31DEC97	5 98FEC/290/3141
REQUEST FOR ADDITIO	NAL INFORMATION 2ND		1JUL97 -31DEC97	6 98FEC/305/4220
1998 APRIL QUARTERLY	2,604	25,280	1JAN98 -31MAR98	11 98FEC/316/0381
APRIL QUARTERLY	- AMENDMENT -	-	1JAN98 -31MAR98	3 98FEC/354/4139
MOTICE OF FAILURE TO	O FILE		1JAN98 ~31HAR98	2 98FEC/309/4178
1'ST LETTER INFORMA	TIONAL NOTICE		1JAN98 ~31MAR98	2 98FEC/348/1315
JULY QUARTERLY	178,877	52,565	1APR98 ~30JUN98	63 98FEC/326/0295
OCTOBER QUARTERLY	O	30,423	1JUL98 -30SEP98	11 98FEC/362/4580
PRE-GENERAL	0	16,925	10CT98 -140CT98	6 98FEC/362/4574
TOTAL	320,496	0 261,925	0	148 TOTAL PAGES

All reports listed have been reviewed, with the exception of the October Quarterly, Pre General, and amended April Quarterly Reports.

Ending Cash on Hand as of 10/14/98: \$124,609.39

Debts and Obligations owed to the Committee: \$0.00

Debts and Obligations owed by the Committee: \$0.00

YEAR-END

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 29, 1997

WHO MUST FILE

Party committees and PACs (Nonconnected Committees and Separate Segregated Funds) must file a Year-End Report on January 31, 1998.

REPORT Year-End	REPORTING PERIOD* 07/01/97 - 12/31/97	MAILING DATE** 01/31/98	FILING DATE 01/31/98
II. Monthly Filers		REG./CERT.	
REPORT	REPORTING PERIOD*	MAILING DATE**	FILING DATE ·
Vear-Find	12/01/07 12/31/07	01/31/08	01/31/09

LAREL

Committees should affix the peel-off label from the envelope to line 1 of the report. Corrections should be made on the label.

COMPLIANCE

Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms (except for FEC approved computer generated forms) will be required to refile.

ELECTRONIC FILING

For reports covering activity occurring in 1997 (and later), political committees have the option of filing electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing Gets Underway at FEC," and call the Data Division at (800) 424-9530 or (202) 219-3730.

^{*}These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

^{**} Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

1998 FILING SCHEDULE

I. QUARTERLY FILERS

		REG./CERT.	
		MAILING	FILING
REPORT	REPORTING PERIOD*	DATE**	DATE
April Quarterly	01/01/98 - 03/31/98	04/15/98	04/15/98
July Quarterly	04/01/98 - 06/30/98	07/15/98	07/15/98
October Quarterly	07/01/98 - 09/30/98	10/15/98	10/15/98
Pre-General	10/01/98 - 10/14/98	10/19/98	10/22/98
Post-General	10/15/98 - 11/23/98	12/03/98	12/03/98
Year-End	11/24/98 - 12/31/98	01/31/99	01/31/99

II. MONTHLY FILERS

		REG./CERT.	
		MAILING	FILING
REPORT	REPORTING PERIOD*	DATE**	DATE
February	01/01/98 - 01/31/98	02/20/98	02/20/98
March	02/01/98 - 02/28/98	03/20/98	03/20/98
April .	03/01/98 - 03/31/98	04/20/98	04/20/98
May	04/01/98 - 04/30/98	05/20/98	05/20/98
June	05/01/98 - 05/31/98	06/20/98	06/20/98
July	06/01/98 - 06/30/98	07/20/98	07/20/98
August	07/01/98 - 07/31/98	08/20/98	08/20/98
September	08/01/98 - 08/31/98	09/20/98	09/20/98
October	09/01/98 - 09/30/98	10/20/98	10/20/98
Pre-General	10/01/98 - 10/14/98	10/19/98	10/22/98
Post-General	10/15/98 - 11/23/98	12/03/98	12/03/98
Year-End	11/24/98 - 12/31/98	01/31/99	01/31/99

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement is triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the day of the election.

^{*}These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

^{**} Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they raust be received by the filing date.

QUARTERLY

Attachment 2 Page 3 of 4

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 20, 1998

WHO MUST FILE

All Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) filing on a quarterly basis must file a Quarterly Report in April.

***************************************		REG./CERT.	
REPORT .	REPORTING PERIOD*	MAILING DATE**	FILING DATE
April Quarterly	01/01/98 - 03/31/98	04/15/98	04/15/98

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC or Party Committee that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement is triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the day of the election.

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 1998 <u>Record</u>.

LABEL

Committees should affix the peel-off label from the envelope to line 1 of the report. Corrections should be made on the label.

^{*}These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

^{**} Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

PARTIES AND PACS

April Quarterly

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from quarterly to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

ELECTRONIC FILING

Political committees have the option of filing their reports electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing of Disclosure Reports," and call the Data Division at (800) 424-9530 or (202) 694-1250.

COMPLIANCE

Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms (except for FEC approved computer generated forms) will be required to refile.

16105 97352

WESTERN

WESTERN UNION COMMERCIAL SERVICES

CONFIRMATION OF MAILGRAM TO: MR MACKIN

LINTL BR'HOOD-ELEC WRKERS POL EOUC CHTE 1719 SPRING GARDEN ST PHILADELPHIA PA 19130-3915

PEDERAL ELECTION COMMISSION SHAWN WERTH 999 E ST. NW. WASHINGTON DC 204630001

MAY 7, 1998

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IDENTIFICATION NUMBER: COO162818

REFERENCE: APRIL QUARTERLY (01/01/1998 - 03/31/1998)

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED. YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT.

IT IS IMPORTANT THAT YOU FILE THIS REPORT IMMEDIATELY WITH THE FEDERAL ELECTION COMMISSION. 999 E STREET, N.W., WASHINGTON, D.C., 20463. A COPY OF THE REPORT OR RELEVANT PORTIONS SHOULD ALSO BE FILED WITH THE SECRETARY OF STATE OR EQUIVALENT STATE OFFICER.

ALTHOUGH THE COMMISSION MAY INITIATE AN AUDIT OR LEGAL ENFORCEMENT ACTION CONCERNING THIS MATTER, YOUR PROMPT RESPONSE AND A LETTER OF EXPLANATION WILL BE TAKEN INTO CONSIDERATION.

IF YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE CONTACT MONICA A. JOHNSON ON OUR YOLL FREE NUMBER 18001424-9530. OUR LOCAL NUMBER IS 12021694-1130.

SINCERELY,

JOHN D. GIBSON ASSISTANT STAFF DIRECTOR REPORTS ANALYSIS DIVISION

DATE:

June 1, 1998

ANALYST:

Jennifer K. Wall

COMMITTEE:

International Brotherhood of Electrical Workers Local 98 Committee on Political

Education (C00162818)

I called the Committee and asked to speak with Mr. Mackin, the treasurer of the Committee. He was not available and I was referred to Frannie Walsh who is in charge of filing the reports. I informed Mr. Walsh that the Commission had not yet received the 1998 April Quarterly Report (1/1/98 - 3/31/98). He said that the Committee filed the original report on April 9, 1998 and sent a follow-up copy on May 11, 1998. I told him that the Commission does not indicate the receipt of either report. I verified the Committee's identification number and the FEC mailing address. I encouraged him to file another copy of the report to my attention as soon as possible to avoid further legal action. He said that the Committee would send another copy right away.

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DATE:

September 10, 1998

ANALYST:

Richard M. Ng

COMMITTEE:

International Brotherhood of Electrical Workers Local 98 Committee on Political

Education (C00162818)

I called the Committee and asked to speak with Mr. Francis Walsh. I informed him that his correspondence with Jennifer Wall indicated the Committee made two attempts to deliver the 1998 April Quarterly Report. The first attempt was made on April 9, 1998, and the second attempt was made on May 11, 1998. I asked Mr. Walsh if the Committee had mail receipts for those filings. He said the Committee's Audit Department actually handles the filings and had occurred problems at that time. He assured me the Committee has receipts for all filings and would fax a copy of the receipts for the 1998 April Quarterly Report.

WILLIAM INO. YO

INTERNATIONAL BROTHERHOOD OF FL

1719 Spring Garden Street Philodelphia, Pennsylvania 19130

Business Office: 215 163-2274

Financial Office: 215-553-8991

FAX: 215-561-2168

TELECOPIER TRANSMITTAL COVER SHEET

TO:	RICHARD NE
FROM:	FRAN WALST
DATE:	9/10/98
# OF PA	GES (INCLUDING COVER SHEET):
	INSTRUCTIONS OR COMMENTS:
RECE	VETS FOR 4/9/98 AND 5/4/98 AS YOU
KEQ	VESTED THANK YOU
	Zramus Walsh

IF YOU DO NOT RECEIVE ALL OF THE PAGES OR ARE HAVING A PROBLEM WITH THE TRANSMISSION, PLEASE CALL (215) 563-: 8991

NOTE: The comments on and attachment to this cover sheet are intended only for the use of the individual or entity to which it is addressed, and may contain information that is priviledged, confidential and exempt from discloture under applicable law. It the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original to us, at the above address, via the U.S. Postal Service. Thank you,

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Federal Election Commission ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

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DATE:

September 14, 1998

ANALYST:

Richard M. Ng

COMMITTEE:

International Brotherhood of Electrical Workers Local 98 Committee on Political

Education (C00162818)

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Mr. Walsh returned my call. I informed him that the receipts apparently indicates the committee's attempts to file the reports, however, the receipts do not indicate the reports were received by the FEC. I asked him if the Committee had return receipts indicating the reports were delivered to the FEC. He said he would contact UPS to inquire if the reports were delivered and received by the FEC and would then fax me copies of those receipts.

DATE:

September 16, 1998

ANALYST:

Richard M. Ng

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International Brotherhood of Electrical Workers Local 98 Committee on Political

Education (C00162818)

Mr. Walsh called to inform me that he has UPS receipts showing the reports were signed for by the FEC and will fax copies of the receipts.

11:07 Local Uran No. 98

INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS

1719 Spring Gorden Street Philadelphia, Pennsylvania 19130

Business Office: 215-563-2274 Financial Office: 215-563-8991

FAX: 215-561-2166

TELECOPIER TRANSMITTAL COVER SHEET

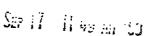
TO: RICHARD NG	
FROM: FRANCIS WALSH	
DATE: 9/16/98	
# OF PAGES (INCLUDING COVER SHEET): 3	
SPECIAL INSTRUCTIONS OR COMMENTS:	
HERE ARE THE UPS RECE	IFTS
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IF YOU DO NOT RECEIVE ALL OF THE PAGES OR ARE HAVE	NG A PROBLEM
WITH THE TRANSMISSION, PLEASE CALL (215) 563-: 8991	

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hipper 170X10

Page 1 of 2 Attachment 10





ATTN: FRANCIS WALSH PHONE: (215)563-8991

DELIVERY NOTIFICATION

FAX RESPONSE

INQUIRY FROM:

FRANCIS WALSH

LOCAL 98

1719 SPRING GORDAN ST PHILADELPHIA PA 19130

SHIPMENT TO:

FEDERAL ELECTION COMMISSION

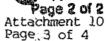
999 E ST NW 5TE 824 Washington DC 20004

United Parcel Service

Tracking Identification Number... N2223201889

According to our records 1 parcel was delivered on 05/12/98 at 9:29 A.M.. The shipment was signed for by DUNN as follows:

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United Parcel Service

Service it is and will ATTN : FRANCIS WALSH PHONE: (215)563-8991

DELIVERY NOTIFICATION

FAX RESPONSE

INQUIRY FROM:

FRANCIS WALSH

LOCAL 98

1719 SPRING GORDAN ST PHILADELPHIA PA 19130

SHIPMENT TO:

PEDERAL ELECTION COMMISSION

999 E ST NW

WASHINGTON DC 20004

Tracking identification Number... N2223201941

According to our records 1 parcel was delivered on 64/10/98 at 9:33 A.M.. The shipment was signed for by JONES as follows:

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Federal Election Commission ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

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CAMPAIGN EXPENSE REPORT COMMONWEALTH OF PENNSYLVANIA - DEPARTMENT OF FRANCE BUREAU OF COMMISSIONS, ELECTIONS AND LEGISLE OF 305 NORTH OFFICE BUILDING

narrisburg, pa 17120 Narrisburg, pa 17120

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SECTION 1.2

ALL OTHER CONTRIBUTIONS AND RECEIPTS — \$50.01 TO \$250.00 (Except Political Committee Contributions)

USE THIS SECTION TO FTERHIZE ALL OTHER CONTRIBUTIONS WITH AN AGGREGATE VALUE FROM \$50.01 TO \$250.00 FOR THE REPORTING PERIOD (Excluding Contributions Received From Political Committees Listed on Section 1.1).

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SCHEDULE I SUMMARY OF CONTRIBUTIONS AND RECEIPTS

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SECTION 3 SUMMARY OF REFUNDS

USE THIS SECTION TO ITEMIZE ALL REPUNDS RECEIVED FOR PAYMENTS SUCH AS ADVANCE DEPOSITS MADE OR PREPAID SERVICES NOT RENDERED. REFUNDS WILL OCCUR WHEN THE FINAL SERVICE CHARGE IS LESS THAN THE HITTAL PRYMENT.

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SCHEDULE II SUMMARY OF EXPENDITURES

use this section to itemize all expenditures made during the reporting period

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Total This Period - Enter on Page 1 (Foce Sheet) - Item D

SCHEDULE

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SUMMARY OF EXPENDITURES

Local Union #98-1.6.E.W. Committee on Political Education			
Name and full address	Description of Expenditure	Dain_	2.50.
	Contributions	1/13/90	1,000.0
Casey for Auditor General Committee K-ANE BLOG SUITE DF	Contribution	1/13/98	3.000
SCRANTON, PA 19503 Salvatore for Seneile 14219 Barcelow Street Philadelphia, PA 19116	Contribution	1,11644	i garas
Gordon for Judge 5030 CXFORD AVE	Contribution	1/16/93	75.0
PHILA PA 19124 Kethy Manderino for State Representative 6239 RIDEE AVE	Contribution	1/76***	2 500
FHILA. PA. 19123 Friends of Sendy William TO WEST COURT ST	Contribution	1/16/98	500.
Cylestown, PA. 18901 Butkoviz for Legislative 1118 Uprul: Avenue Philadelphia, PA 18111	Contraction	2/6/96	50%
Ocneticci '95 Committee 1616 S. Broad Street Philadelphia, PA 19165	Contribution	2/5/96	1,00
Friends to Elect Miles McGoshen 4902 Cottonen Avenue Philodelphia, PA 18198	Constantes	2/5/96	\$500
1239 RIDGE AVE. PHILA. PA. 19128	The state of the s	2/9/90	5
Clurt Weldon for Congress P.O. Box 40078 Philadelphia, PA 19108	Contribution	5/1.2/∋8	50-

For \$430/94) Filing Date

SCHEDULE N

BUMMARY OF EXPERENTARES

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Local Union #98	ios Noss A	2/18/55	9.00E
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Philestolphia PA 10125		•	
First Democratic Ward	Contribution	2/20/98	1 150
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Phila delichie, PA 19888		1	
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Brier: Young for City Council	Contribution	2/20/98	250
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Philadelphia, PA 19135			1
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9100 Francisco Avenue		.i	•
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SOMEDULE B

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7th INeed-Old Knights of Columbus 302 E. TIOFA ST. PHUA. PA. 19124	Contribution	3.78%	273 t
BE Keller to: State Representative 353 Dely Street Philadelphia, PA 19148	Contribution	\$/26-5-=	2.500 ·
Conmittee to Re-elect Roulla C. Younghbood 8512 Williams Average Philindelphia, PA 19150	Controvidos	3.56.55	500
Elko, Fischer, McCebe & Rudman, Lisk 524 N. <i>Providence Road</i> Media, PA 19083	Preparation of Cope Reports	3/39/59	950
SUBTOYAL THIS PAGE			6 150
GRAND TOTAL		4 CTT CTT CTT CTT CTT CTT CTT CTT CTT CT	25,931

NOTE A

(1)

This cost was expended by the individual listed who distributed these funds to various other members who helped with election day in November, 1947 by working the polite, etc. The funds were distributed for parking, phone, funch, and gas. The Cope Fund reimbureed this individual, on the date listed above and no individual received more than \$500.00.

Federal Election Commission

ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS

The Commission has added this page to the and of this filing to indicate how it was recived.

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Date of Receipt

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4-16-95

DATE:

September 18, 1998

ANALYST:

Richard M. Ng

COMMITTEE:

International Brotherhood of Electrical Workers Local 98 Committee on Political

Education (C00162818)

I called Mr. Walsh to explain that the reports the Committee submitted on April 9, 1998, and May 11, 1998 apparently were State filings. I informed him that because the FEC did not receive a timely filed Federal report, the matter will be referred to the Office of General Counsel. Additionally, I told him the receipt facsimiles will be processed and attached to the public record and all correspondence will be taken into consideration. He informed me the problems the Committee's Audit Department had in April and May led to the confusion of the incorrect filings.